

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: **MICHAEL EARL CLARK**

**CASE NO.: 17-00587-NPO  
CHAPTER 13**

**OBJECTION TO SECURED CLAIM(S)**

The Debtor(s), by and through counsel, object(s) to the following pre-petition secured claim(s) and moves the Court to determine the treatment of the following collateral for the purposes of plan confirmation:

<b>CREDITOR:</b>	State Farm Fnc'l Svcs F 3 State Farm Plz Bloomington, IL 61791
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Description of Collateral:	<b>2004 Mercedes 550</b>
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Alleged Amount Owed:	<b>\$9,380.00</b>
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Value:	<b>\$12,000.00</b>
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Treatment: Pay the alleged amount owed of **\$9,380.00** plus 5% interest over the life of the Chapter 13 plan; or, in the event a timely filed and/or allowed Proof of Claim is filed by or on behalf of this creditor evidencing a purchase-money security interest and that the vehicle loan was acquired **less than 910 days before** the petition filing, pay the amount owed as set forth in such claim plus 5% interest over the life of the Chapter 13 plan; or, in the event a timely filed and/or allowed Proof of Claim is filed by or on behalf of this creditor evidencing a purchase-money security interest and that the vehicle loan was acquired **more than 910 days** before the petition filing, then pay the value of **\$12,000.00** plus 5% interest over the life of the plan **unless** the amount owed as set forth in such claim is less than the value of **\$12,000.00**.

Debtor(s) pray(s) that in the event a timely filed and/or allowed Proof of Claim is filed by or on behalf of any of the abovementioned creditors evidencing an **unsecured interest**, that said creditor be paid the same percentage distribution as all other unsecured creditors through the Chapter 13 plan and further pray(s) that either upon payment of the underlying debts determined under non-bankruptcy law or a discharge under Bankruptcy Code §1328, all liens be cancelled

and any and all title documents be promptly delivered to Debtor(s).

**DATED: March 24, 2017**

Respectfully submitted,

Michael Earl Clark

/s/Tylvester O. Goss  
TYLVESTER O. GOSS

**CERTIFICATE OF SERVICE**

On March 24, 2017, a copy of this pleading was served on each of the persons/entities listed above by United States Mail and to the following parties via Notice of electronic Filing NEF through the ECF system:

U.S. Trustee  
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J.C. Bell, Trustee  
[Mdg@jc.bell.net](mailto:Mdg@jc.bell.net)

/s/ Tylvester O. Goss  
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